

Register of Interests, Gifts and Invitations, business activities – Guidance for Employees

Introduction

Officers of the Council are required to declare information to a nominated senior manager if there could be a potential conflict of interest between the officer's professional work and their personal interests. This covers a range of activities and interests as follows:

1. Private interests in an organisation that the Council works with or intends to work with. This may be the officer themselves or a close relative;
2. Accepting gifts or invitations;
3. Undertaking additional employment or business activities.

Details of the requirements are set out below.

General Standards and Responsibilities

It is essential that employees maintain the highest standards of conduct, integrity, impartiality and objectivity and that public confidence in the Council's staff is maintained at all times.

If you are in any doubt as to whether you should declare an interest you should seek further advice from your Deputy Director.

It is your responsibility to ensure that any matter covered by this guidance note is properly declared and, where appropriate, authorised. In addition:

- If the person to whom you should make the declaration is absent you should ensure that their manager is informed (in addition to making your MyView declaration); and
- Where you do not report directly to the person to whom the official declaration should be made, you should also inform your immediate manager.

1. Declaring a private interest in an organisation the Council works with or intends to work with.

What must I do?

This will vary depending upon the type of interest you have and how you come into contact with contractors/organisations during your work. Please see the specific details below:

- General Business Interest – If, in carrying out your duties, you may have any involvement in any matter, or have any contact or dealings with a business organisation in which you have an interest, you must immediately disclose this to your Deputy Director as soon as possible via MyView and specify who will be dealing with the matter in your place.
- Private use of a Council Contractor - If you have dealings with contractors during the course of your employment and you use one of those contractors for private work, knowing that the Council employs that contractor, you must immediately declare this fact to your Deputy Director, via MyView.
- Financial Interest in Committee matter - Where you have:
 - i) a financial interest in any contract, proposed contract or other matter
OR
 - ii) a non-financial interest in any matter

on the agenda of a Committee, Sub-Committee or Panel, or which appears likely to be raised at that meeting, you must openly disclose this at the beginning of the meeting or as soon as practicable thereafter. Your disclosure will be recorded in the minutes of the meeting.

- Financial Interest in Contract - If you have a direct or indirect financial interest in a contract that has been, or is proposed to be, entered into by the Council you must immediately notify the Deputy Director HR and Corporate Support via MyView.
- Related Party Transactions (Senior Officers only) – If you, or a close relative, have a significant stake in a contractor, charity or other organisation where the Council has also paid monies to that organisation, you will be asked to declare this to the Deputy Director of Finance on an annual basis via MyView.

Where can I get more information?

The [Employee Code of Conduct](#)

Where is the information kept?

Disclosures of private interests are recorded on TOPS via MyView. In addition, Related Party Transactions are also published in the annual Statement of Accounts.

2. Accepting gifts or invitations

What must I do?

You must not accept invitations of hospitality unless you have first obtained approval. Invitations involving attendance outside normal working hours may be accepted only on the authority of your Deputy Director. You must seek approval in advance via MyView.

You must exercise the utmost discretion in accepting outside hospitality of any kind. Acceptance may make it difficult to avoid some obligations to the party offering it, and may later be thought to have affected your impartiality in dealing with official matters.

Invitations must not normally be accepted but, where it is clearly evident that the work of the Authority would be facilitated, occasional invitations to attend receptions, modest working lunches and the like may be accepted if approved by your Deputy Director. It will not always be possible to reject offers of hospitality from those who either have or might wish to have contractual relationships with the Council. The decision whether to accept it or not must depend on the circumstances in each case, bearing in mind the need to act cautiously at all times.

In exceptional circumstances, where it is not possible to seek prior approval, you must inform your manager immediately afterwards and submit a retrospective request via MyView.

If you receive, or are offered a gift, it should be declined or returned and the matter must be reported to your Deputy Director via MyView.

Where can I get more information?

The [Employee Code of Conduct](#)

Where is the information kept?

Details of gifts and hospitality are recorded on TOPS via MyView.

3. Undertaking additional employment or business activities
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What must I do?

If you wish to undertake additional employment or another business activity, you must seek permission from your Deputy Director (or simply notify the Deputy Director if you are graded Bexley 08 or below) via MyView.

You must do this regardless of the type of work or business you intend to do.

Where can I get more information?

The [Employee Code of Conduct](#)

Where is the information kept?

Details of additional employment or business activities are recorded on TOPS via MyView.